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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DYLAN JOSHUA ROBINSON,) Case No.: 1:24-cv-00828-KES-BAM
Plaintiff,)
vs.) STIPULATION AND [PROPOSED] ORDER
FRANK BISIGNANO,) FOR AN EXTENSION OF TIME
Commissioner of Social Security,)
Defendant.)

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from June 9, 2025, up to and including July 9, 2025. This is the Defendant's first request for an extension.

Based on a review of the record, undersigned counsel requires additional time to explore settlement options. Defendant apologizes to the Court for any inconvenience caused by this delay. Undersigned counsel contacted Plaintiff's counsel on June 6, 2025, and he had no objection to this request.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

1 Respectfully submitted,

2 Dated: June 9, 2025

/s/ *Jonathan O. Peña**

(*as authorized via e-mail on June 6, 2025)

JONATHAN O. PEÑA

Attorney for Plaintiff

5 Dated: June 9, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration

9 By:

/s/ *Noah Schabacker*

NOAH SCHABACKER

Special Assistant U.S. Attorney

10 Attorneys for Defendant

13 **ORDER**

14 Generally, requests for court-approved extensions brought on the required filing date are
15 looked upon with disfavor. L.R. 144(d). However, pursuant to the parties' stipulation, and cause
16 appearing, Defendant shall have an extension, up to and including July 9, 2025, to respond to
17 Plaintiff's Motion for Summary Judgment. All other deadlines in the Court's Scheduling Order
18 are modified accordingly.

19 IT IS SO ORDERED.

20 Dated: June 10, 2025

/s/ Barbara A. McAuliffe

21 UNITED STATES MAGISTRATE JUDGE